

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
Caption in compliance with D.N.J. LBR  
9004-1(b)**

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In re:

BLOCKFI INC., *et al.*,

Debtors.

Case No. 22-19361(MBK)

Chapter 11

**LIMITED OBJECTION OF EQUI FUNDS TO TWELFTH  
AND FOURTEENTH OMNIBUS CLAIMS OBJECTIONS**

Equi Balanced Fund, LP, Equi Real Estate Fund, LP and Equi Growth Fund, LP  
(collectively, the “Equi Funds”), by and through their undersigned counsel, hereby submit this  
Limited Objection to Wind-Down Debtors’ Twelfth and Fourteenth Omnibus Claims Objections  
(collectively, the “Claims Objections”) [Docket No. 1878, 2010].

**Background**

1. On November 28, 2022 (the “Petition Date”), BlockFi, Inc. and certain affiliates  
(collectively, the “Debtors”) each filed voluntary petitions for relief under Chapter 11 of the  
United States Bankruptcy Code.

2. On January 30, 2023, the Bankruptcy Court entered an *Order (I) Setting Forth Dates for Submitting Proofs of Claim, (II) Approving Procedures for Submitting Proofs of Claim, (III) Approving Notice Thereof, and (IV) Granting Related Relief* (the “Bar Date Order”). [Docket No. 440].

3. On March 30, 2023, each of the Equi Funds timely filed Proofs of Claim (collectively, the “Equi Claims”) in accordance with the Bar Date Order.

4. On November 15, 2023, the Wind-Down Debtors filed their Twelfth Claims Objection seeking to disallow and expunge certain claims filed in this bankruptcy proceeding.

5. On December 21, 2023, the Wind Down Debtors filed their Fourteenth Claims Objection seeking to disallow and expunge certain claims set forth on Schedule 1 thereto.

6. The Claims Objections do not identify the names of the claimants who are subject to the Objections; the claimants’ names are redacted.<sup>1</sup>

7. Because the Equi Funds are unable to determine from the Claim Objections whether they are among the claims sought to be disallowed or modified, Equi submits this Limited Objection for clarification and to reserve all rights relating to the Claims Objections including, without limitation, the right to fully respond to the Claims Objections in the event that the Equi Claims are implicated.

8. The Equi Claims have not been paid or otherwise satisfied.

WHEREFORE, the Equi Funds respectfully request that the Court deny the Claims Objections as they relate to the Equi Funds and requests such other and further relief that this Court deems necessary and just.

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<sup>1</sup> Further, the claims agent does not appear to have assigned claim numbers for all of the as-filed claims.

Respectfully submitted,

Dated: January 4, 2024

STEVENS & LEE, P.C.

By: /s/ John C. Kilgannon

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